

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

STEWARD HEALTH CARE SYSTEM,  
LLC, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 24-90213 (CML)  
(Jointly Administered)

Dr. Manisha Purohit, Dr. Diane Paggioli,  
Dr. James D. Thomas, Dr. Thomas Ross,  
Dr. Michael Regan, Dr. Peter Lydon,  
Dr. Sridhar Ganda, and Dr. A. Ana Beesen,  
for themselves and those similarly situated,

Plaintiffs,

V.

Misc. No. 4:25-mc-000461

Steward Health Care System LLC,  
IASIS Healthcare, LLC, and  
Patrick Lombardo  
In His Role as Executive Vice President  
For Human Resources for Steward Health  
Care System LLC; and John and Jane Doe,  
In Their Roles as Committee Members and/or  
Management Board Members

Defendants.

**DECLARATION OF A. ANA BEESEN IN SUPPORT OF EMERGENCY MOTION  
FOR AN ORDER STAYING HEARING ON TURNOVER MOTION**

I, A. Ana Beesen, being over 18 years of age and competent in all respects to testify, having personal knowledge of the facts set forth below, and under penalties of perjury, hereby state, swear, and affirm the following, pursuant to § 1746 of title 28 of the United States Code:

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

1. I am a physician, previously employed by Steward Health Care System, LLC, or an affiliate of Steward (“**Steward**”), one of the debtors and debtors in possession (the “**Debtors**”) in the chapter 11 cases of *In re Steward Health Care System, LLC, et al.*, Case No. 24-90213 (Bankr. S.D. Tex.).

2. I submit this declaration in support of the *Emergency Motion for an Order Staying Hearing on Turnover Motion* [Dkt. No. 1] (the “**Emergency Motion**”) filed by the Participants.<sup>2</sup> I am one of the Participants, as a participant in and beneficiary of the Steward Health Care Deferred Compensation Plan (the “**SHC DC Plan**” or the “**Plan**”).

3. I began working for Steward Healthcare System in April 2018, worked for them for 5 years, and resigned from Steward in April 2023. I am currently employed by University of Massachusetts Memorial Medical Center.

4. I became a participant in the SHC DC Plan in December 2022. When presented with the option to become a participant in the SHC DC Plan (and re-enroll in the Plan, in subsequent years), I was not provided the opportunity to negotiate the terms of my participation in such a Plan.

5. Once I enrolled in the Plan for a particular year, I could not unenroll until the following year’s enrollment period.

6. At no time—prior to becoming a participant in the Plan or before annual enrollment—was I presented with information regarding the financial condition of Steward, and at no point was I informed that Steward was insolvent. Nor was I advised that any funds I deferred would ever be at risk; I understood this to simply be a deferral of my compensation to a later period when I might be in a lower tax bracket.

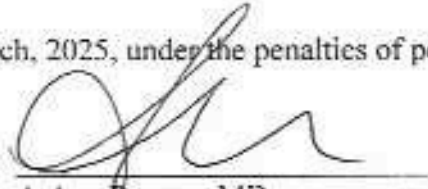
7. If the assets of the Plan are turned over to the Debtors’ bankruptcy estates, I will lose significant funds that I invested for my retirement. While I work full time, I am an early-career

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Emergency Motion.

physician with a significant amount of educational debt from medical school in addition to standard living expenses. It would be extraordinarily difficult for me to attempt to recreate those retirement savings while also servicing my educational debt and paying for living expenses.

Solemnly affirmed and signed this 14th day of March, 2025, under the penalties of perjury.

  
A. Ana Beesen, MD